

AO 91 (Rev. 08/09) Criminal Complaint

MAY 10 2019

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Juan Pablo MARTINEZ Guerra
YOB: 1999 Citizenship: Honduras

Case No.

M-19-mj-1069-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 4, 2019 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1324(a)(1)(A)(ii)

Knowingly or in reckless disregard of the fact that W.F.V.A., a citizen of Honduras, who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport, by foot, said alien in furtherance of such violation of law within the United States, that is, from a location in Roma, Texas to the point of arrest in Roma, Texas.

This criminal complaint is based on these facts:

On May 4, 2019, Border Patrol Agents apprehended a male subject, later identified as Juan Pablo MARTINEZ Guerra, and a juvenile after they illegally crossed into the United States by wading the Rio Grande River near Roma, Texas. MARTINEZ claimed to be traveling along with his juvenile son. An immigration inspection was conducted and both subjects were determined to be illegally present in the United States.

✓ Continued on the attached sheet.

Approved AUSA LAURA GARCIA

Alfredo Vidales

Complainant's signature

Alfredo Vidales, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/10/2019

10:53 am

Peter E. Ormsby

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter E. Ormsby

Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS

ATTACHMENT TO CRIMINAL COMPLAINT:

RE: Juan Pablo MARTINEZ Guerra

CONTINUATION:

On May 8, 2019, Homeland Security Investigations Special Agents (HSI) interviewed MARTINEZ after it was discovered that MARTINEZ was using a fraudulent document to claim a relation to the juvenile and further their unlawful entry into the United States. Prior to being interviewed, MARTINEZ was read his Miranda Rights and chose to waive them.

MARTINEZ stated that in fact he is not the father of the child and was transporting the child in order to successfully gain entry into the United States. MARTINEZ admitted that he previously obtained the child's fraudulent document to show him as the father. MARTINEZ stated that he intended on transporting the child from Honduras to New Orleans, La. MARTINEZ stated that he knew the child was illegally in the United States and intended on using the fraudulent document to further the juvenile's illegal entry and presence in the United States.